

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In Re:) No. 24-00788
Maurice Saenz) Judge Timothy A. Barnes
)
Debtor(s).) Chapter 13

NOTICE OF MOTION

To: SEE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that on **February 15, 2024** at **9:30 AM**, I will appear before the Honorable Timothy A. Barnes or any judge sitting in that judge's place, either in **Courtroom 744 of the Everett McKinley Dirksen United States Courthouse, 219 S. Dearborn Street, Chicago, IL 60604**, or electronically as described below, and present the motion of Debtor to Extend Time to File Required Schedules, Declarations, Plan and Other required Documents, a copy of which is attached.

Important: Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person.

You may appear electronically by video or by telephone.

To appear by video, use this link: <https://www.zoomgov.com/join>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828- 7666. Then enter the meeting ID and password.

Meeting ID and passcode. The meeting ID for this hearing is: **161 329 5276 and the passcode is 433658**. The meeting ID and passcode can also be found on the judge's page on the court's website.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without calling it.

/s/ Vaughn White
Vaughn White
VW LAW LLC
Attorney for Debtor(s)
1755 Park St, Suite 200
Naperville, IL 60563
312-888-0131
ARDC # 6198291

CERTIFICATE OF SERVICE

I, Vaughn A. White, an attorney, certify that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on February 5, 2024.

/s/ Vaughn White
Vaughn White

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE:) Case No. 24-00788
Mauricia Saenz ,)
Debtor(s)) Chapter 13
) Judge Timothy A. Barnes

**MOTION TO EXTEND TIME TO FILE DEBTOR'S REQUIRED SCHEDULES,
DECLARATIONS, STATEMENTS, PLAN AND OTHER DOCUMENTS**

NOW COME the Debtor(s), Mauricia Saenz by Attorney Vaughn A. White, and move(s) this Court to grant an extension until February 19, 2024 , to file Schedules, Declarations, Statements, and other required documents. In support of this Motion, the Debtor respectfully states and alleges as follows:

1. On January 22, 2024 Debtor filed a Chapter 13 Petition.
2. Debtor's filing was a deficient filing, which was missing Schedules, Declarations, Statements, and other documents.
3. Debtor's' Schedules, Declarations, Statements, and other documents would, in absence of this motion be due on February 5, 2024.
4. Debtor and Debtor's Counsel need additional time to gather information and review the Schedules, Declarations, Statements, and other required documents before they can be filed.
5. Debtor, therefore, respectfully requests additional time be granted to February 19, 2024, to file Debtor's Schedules, Declarations, Statements, Plan and other documents.

WHEREFORE, Debtor prays for the following relief:

- A. That Debtor be granted until February 19, 2024, to file Debtor's Schedules, Declarations, Statements, Plan and other documents; and
- B. For such other and further relief as this Court deems equitable and just.

Respectfully Submitted,

/s/ Vaughn A. White
Vaughn A. White
Attorney for Debtor

Vaughn A. White
Illinois ARDC # 6198291
VW LAW LLC
Attorney for Debtor(s)
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Naperville, IL 60563
312-888-0131
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(p)AMERICREDIT FINANCIAL SERVICES DBA GM FINAN
PO BOX 183853
ARLINGTON TX 76096-3853

AmeriCredit Financial Services, Inc. dba GM
P O Box 183853
Arlington, TX 76096-3853

Capital One Auto Finance
Attn: Bankruptcy 7933 Preston Rd
Plano, TX 75024-2302

Capital One Auto Finance, a division of
AIS Portfolio Services, LLC
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118-7901

(p)JPMORGAN CHASE BANK N A
BANKRUPTCY MAIL INTAKE TEAM
700 KANSAS LANE FLOOR 01
MONROE LA 71203-4774

Comenity Bank/Victoria Secret
Attn: Bankruptcy
PO Box 182125
Columbus, OH 43218-2125

Comenity/Burlington
Attn: Bankruptcy
PO Box 182125
Columbus, OH 43218-2125

Fortiva
Attn: Bankruptcy
PO Box 105555
Atlanta, GA 30348-5555

Freedom Mortgage Corporation
Attn: Bankruptcy Attn: Bankruptcy
907 Pleasant Valley Ave , Ste 3
Mt Laurel, NJ 08054-1210

GM Financial
Attn: Bankruptcy
PO Box 183853
Arlington, TX 76096-3853

(p)MEDICAL BUSINESS BUREAU LLC
1460 RENAISSANCE DR
SUITE 400
PARK RIDGE IL 60068-1349

Synchrony Bank
Paypal Credit
PO Box 965060
Orlando, FL 32896-5060

Synchrony Bank/Sams
Attn: Bankruptcy
Po Box 965060
Orlando, FL 32896-5060

VW LAW LLC
1755 Park St Suite 200
Naperville, IL 60563-8404

Mauricia Saenz
1699 Park Avenue
Hanover Park, IL 60133-3610

Patrick S Layng
Office of the U.S. Trustee, Region 11
219 S Dearborn St
Room 873
Chicago, IL 60604-2027

Thomas H. Hooper
Office of the Chapter 13 Trustee
55 E. Monroe St.
Suite 3850
Chicago, IL 60603-5764

Vaughn A White
Vw Law LLC
1755 Park St
Suite 200
Naperville, IL 60563-8404

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

AmeriCredit Financial Services, Inc.
dba GM Financial
P O Box 183853
Arlington, TX 76096

Chase Auto Finance
Attn: Bankruptcy
PO Box 901076
Fort Worth, TX 76101-2076

Medical Business Bureau
Attn: Bankruptcy 1460 Renaissance Drive
Park Ridge, IL 60068

